

February 21, 2017

Via Federal Express

Ms. Christopher J. Kirkpatrick
Secretary
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Re: National Futures Association: Proposed NFA Financial Requirements
Section 17: Swap Dealer and Major Swap Participant Reporting
Requirements*

Dear Mr. Kirkpatrick:

Pursuant to Section 17(j) of the Commodity Exchange Act ("CEA"), as amended, National Futures Association ("NFA") hereby submits to the Commodity Futures Trading Commission ("CFTC" or "Commission") the proposed adoption of NFA [Financial Requirements Section 17](#). NFA's Board of Directors ("Board") unanimously approved the adoption of this rule on February 16, 2017, and NFA respectfully requests Commission review and approval of the proposal.

PROPOSED AMENDMENTS
(additions are underscored)

NATIONAL FUTURES ASSOCIATION

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FINANCIAL REQUIREMENTS

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SECTION 17. SWAP DEALER AND MAJOR SWAP PARTICIPANT REPORTING REQUIREMENTS.

Each Swap Dealer and Major Swap Participant Member must file the financial, operational, risk management and other information required by NFA in the form and manner prescribed by NFA.

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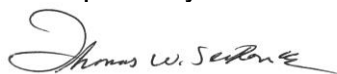
EXPLANATION OF PROPOSED AMENDMENTS

To enhance NFA's regulatory oversight program for Swap Dealers and Major Swap Participants (collectively, SDs) NFA's Board has determined that NFA should collect market and credit risk data from SDs on a periodic basis. NFA intends to use this information to provide insight into the current market and credit risk profiles of SDs and to identify firms that may pose heightened risk in order to allocate NFA's regulatory resources appropriately. In connection with various meetings with SD Members and NFA's Swap Participant Advisory Committee, NFA staff has developed a preliminary list of metrics that will provide NFA with important information for risk monitoring, while minimizing any reporting burden on SDs. Staff continues to work with SD Members and the Swap Participant Advisory Committee to finalize the specific credit and market risk metrics.

In order to implement the new reporting requirements, NFA's Board has adopted NFA Financial Requirements Section 17 to specifically require SDs to file the financial, operational, risk management and other information required by NFA in the form and manner prescribed by NFA. Section 17 is modeled after NFA Financial Requirements Section 8, which allows NFA to collect similar information from FCMs for which NFA is the DSRO. Similar to Financial Requirements Section 8, proposed Financial Requirements Section 17 will specify NFA's general authority to collect the information, but not the specific data elements. Once NFA's Board approves the final data metrics, NFA will notify SDs of the specific data metrics through a Notice to Members.

NFA respectfully requests that the Commission review and approve the proposed adoption of NFA Financial Requirements Section 17.

Respectfully submitted,



Thomas W. Sexton
Senior Vice President and
General Counsel

*The proposed adoption of NFA Financial Requirement Section 17 became effective March 21, 2017.